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STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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July 29, 2004

Mr. Mark Krivanski
Department of Navy
Engineering Field Activity-Northeast
Code 1823
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Site 9, Monitoring Event 23, Follow Up Response to Comments
Naval Air Station, Brunswick

Dear Mr. Krivanski:

The Maine Department of Environmental Protection (MEDEP) has reviewed the Navy's Response to Comments, dated June 15, 2004 for Monitoring Event 23 Report -September/October 2003 for Site 9 (February 2004), prepared by EA Engineering, Science and Technology. Based on that review MEDEP has the following follow up comments.

Comment 6: Section 2.2.2.1, Volatiles, p. 9, 5th paragraph

MEDEP's comment stated that the Navy's report statement in question was true "for sampling events in 2000's". The time period being referenced might better have been stated as 2000 to 2003. As a consequence, the Navy inadvertently shortened the time period to only 2000 in their proposed revised sentence. Therefore, please change "sampling events in 2000" to "sampling events from 2000 through 2003".

Comment 10: Section 3.2, Long-Term Monitoring Goals, p. 14, 1st bullet:

"Based on long-term monitoring data collected since 1995, the vinyl chloride plume appears to be stable in size with decreases noted during the last 2 years of sampling."

MEDEP's Comment. This sentence is internally self-contradictory. The plume cannot be stable and decreasing in the same time frame. Please clarify the meaning of this statement. (ED)

Navy's Response—This sentence has been re-written as shown below:

Based on long-term monitoring data collected since 1995, the vinyl chloride plume appears to be stable in size with, and decreases in maximum concentrations have been noted during the last 2 years of sampling.

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MEDEP's Follow-Up Comment: This rewrite is an improvement as a general statement. MEDEP notes that the size of the boundaries of the vinyl chloride plume has not been delineated on maps in any monitoring event report to date. Therefore, visual representations of plume stability are unavailable for support, and the reader has to compare time snapshots of concentrations at the various monitoring wells. At the key wells (MW-NASB-069 and MW-NASB-080), the vinyl chloride concentrations have been fluctuating considerably, and do not show any consistent trend over the last two years. In future monitoring event reports MEDEP would like the Navy to include a figure that shows the extent of the vinyl chloride plume.

If you have any questions or comments please call me at (207) 287-7713 or email me at claudia.b.sait@maine.gov.

Respectfully,



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